## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No.: 2:05cr216-F
	)	
TIMOTHY WILLIAMS	)	

## **MOTION TO PERMIT FILING**

**COMES NOW** the Defendant, Timothy Williams, by and through undersigned counsel, and requests permission to file the Defendant's Memorandum Regarding Release, tendered simultaneously with this Motion.

In support of this Motion, counsel would show that she was in court for substantial portions of each day since the afternoon of May 31, when the Court directed the filing of this memorandum; that she did not receive the Court's order or pleadings on this matter and was unable initially to file the memorandum by CM/ECF because she had not yet filed a Notice of Appearance on this case; and that because this pleading is filed on the morning of June 3, neither the Court nor the Government will be prejudiced by this filing.

Dated this 3<sup>rd</sup> day of June 2006.

Respectfully submitted,

s/Christine A. Freeman
CHRISTINE A. FREEMAN
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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Susan Redmond, Esq., Assistant U. S. Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

Respectfully submitted,

s/Christine A. Freeman CHRISTINE A. FREEMAN TN BAR NO.: 11892

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